

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

CARLOS BOYLAND, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

Case No. 2:19-cv-02594

MID-SOUTH TRANSPORTATION
MANAGEMENT, INC.,

Defendant.

JOINT MOTION FOR ENTRY OF CONSENT ORDER

The parties jointly move for the entry of the attached consent order conditionally certifying this FLSA collective action case. The parties also seek the Court's approval of the exhibits attached to the consent order.

In support of this motion, the parties submit, for the Court's review and consideration:

Exhibit A: Proposed Consent Order

Exhibit B: Proposed Court Approved Notice

Based on the foregoing, the parties respectfully request that the Court grant this joint motion. By consenting to conditional certification, Defendant does not waive its right to later seek decertification of the collective action.

Respectfully submitted,

/s/ William B. Ryan

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ATTORNEYS FOR DEFENDANT

Dated: 12.20.19

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document has been served via the court's ECF system on Justin R. Barnes, Jay A. Ebelhar and William R. Moseley, Jackson Lewis P.C., 171 17th Street NW, Ste. 1200, Atlanta, GA 30363 on December 20, 2019.

/s/William B. Ryan